

LEWIS J. LIMAN
United States District Judge

From: [Anastasia Alt](#)
To: [Liman NYSD Chambers](#)
Subject: Request for Judicial Consideration - Bochner PLLC Withdrawal (Case No. 1:24-cv-01810-LJL)
Date: Tuesday, October 22, 2024 4:37:29 PM
Attachments: [Re Recoop LLC v. Outliers Inc. \(d b a Thesis Nootropics Inc.\), Case No. 1:24-cv-01810-LJL.pdf](#)

CAUTION - EXTERNAL:

Dear Judge Liman,

I am writing to respectfully submit the attached letter regarding Bochner PLLC's recent motion to withdraw as counsel in the above-referenced case. Given the critical stage of the litigation and the circumstances surrounding Bochner's withdrawal, I am requesting the Court's assistance to ensure an orderly and fair resolution.

Thank you for your time and consideration.

Respectfully,
Anastasia Alt
Owner, Recoop LLC

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The Honorable Lewis J. Liman

United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15C
New York, NY 10007

Re: Recoop LLC v. Outliers Inc. (d/b/a Thesis Nootropics Inc.), Case No.

1:24-cv-01810-LJL

Request for Continuation of Representation or 180-Day Stay of Proceedings

Dear Judge Liman,

Tuesday, October 22, 2024

I am the plaintiff in the above-captioned action and have been represented since the outset by Bochner PLLC. Yesterday afternoon, I received notice forwarded to Your Honor, stating that Bochner PLLC seeks to withdraw, citing irreconcilable differences and claiming that representation has become unreasonably difficult under the New York rules.

The letter Bochner submitted hints at issues beyond typical case challenges, citing confidentiality to obscure the specifics. I respectfully request that the Court require Bochner PLLC to provide more details, and I support an in-camera review of Bochner PLLC's Contingency Fee and Representation Agreement, including my participation as the primary party in interest, to assess if withdrawal is appropriate and compliant with professional conduct standards.

This case remains in discovery, with key depositions scheduled, and settlement offers have been extended, making a potential closure possible. Additionally, there is a related arbitration case pending. I have repeatedly requested essential billing information from Bochner PLLC—specifically on April 22, July 26, August 12, August 22, September 10, September 17, September 18, October 7, October 15, October 17, and October 21—to clarify financial claims under the contingency agreement and prepare for the court-ordered September 24 mediation. Despite these requests, Bochner PLLC has ignored them, continuing to withhold case files, communications, and billing, which leaves me unable to engage new counsel or proceed with a transition. Their withdrawal would effectively halt Recoop LLC's ability to continue the case.

Given these circumstances, I respectfully ask the Court to deny Bochner's motion to withdraw and compel them to fulfill their obligations under the contingency agreement through this crucial phase. Alternatively, if withdrawal is granted, I request a 180-day stay of proceedings to allow Recoop to resolve its dispute with Bochner and secure new contingency counsel. Recoop is not financed for hourly representation in this litigation, and Bochner PLLC's sudden withdrawal has caused significant financial and strategic disruption.

I appreciate Your Honor's consideration of these requests and the opportunity to participate in any in-camera review deemed necessary.

Respectfully submitted,

Anastasia Alt

Owner, Recoop LLC